

EXHIBIT A

State of Illinois)
) ss
County of St. Clair)

UNSWORN DECLARATION UNDER PENALTY OF PERJURY
IN SUPPORT OF COMPLAINT FOR FORFEITURE

I, Ryan Bandy, do hereby depose and declare under penalty of perjury the following:

At all times relevant herein, I have been a Special Agent with the Drug Enforcement Administration (DEA). The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

1. Between January 25, 2016 and January 30, 2016, agents conducted mobile surveillance in reference to an ongoing investigation. During previous surveillance operations within this investigation, agents seized \$116,160.00 in United States currency on October 29, 2015.

2. During the course of the mobile surveillance, a vehicle later determined to be occupied by Cristina Maria BRAY and Javier GODINEZ-JIMENEZ was observed meeting a target (known narcotics distributor) at numerous locations between the above-mentioned dates during the late hours of the night.

3. Agents set up 24-hour surveillance on the vehicle, identified with Texas registration and returned belonging to Maria Nelda San-MARTIN. Investigative checks on the occupants of said vehicle showed BRAY and GODINEZ-JIMENEZ to be involved in a past money seizure of \$470,000 in drug proceeds.

4. On January 30, 2016, agents observed the target vehicle, occupied by BRAY and GODINEZ-JIMENEZ, leave their hotel and proceed to St. Louis Lambert airport. At this time,

BRAY and GODINEZ-JIMENEZ picked up Maria Nelda SAN-MARTIN and the trio eventually headed West on Interstate 55 (I-55), which agents knew was one of two routes back to Texas.

Agents observed the target vehicle exit the I-55 Pevely exit at mile marker 180 and park at a service station where SAN-MARTIN became the driver of the vehicle.

5. At I-55 mile marker 140.2, Missouri Highway Patrol Trooper WB Sevier, along with DEA Special Agent Robert Eisenbarger (SA Eisenbarger), conducted an investigative stop on the target vehicle. During the course of the traffic stop, St. Genevieve (Missouri) K-9 Officer Charles Ochs and his K-9 partner performed an open-air sniff of the vehicle, which returned a positive alert on the vehicle. Due to the safety of the individuals involved, as well as agent's belief of a possible after-market hidden compartment, the vehicle, as well as the occupants, were transported to the St. Genevieve County Sheriff's Office in order to continue the search of the vehicle. The owner of the vehicle, SAN-MARTIN, gave her consent to search the vehicle. During the search, SA Eisenbarger seized a large amount of United States currency hidden in between the roof and the roof lining. The currency was rolled up with rubber bands around it.

6. During an interview with BRAY, she admitted to stashing the currency inside the vehicle after first denying its existence. However, BRAY would not elaborate what the currency was from. BRAY stated that the only currency belonging to her was the one or two thousand inside GODINEZ-JIMENEZ's backpack. BRAY stated that her only employment consisted of buying and selling gold and silver from Mexico and selling it to friends within the United States. Agents believed BRAY's pricing for the cost of gold and silver were off and misleading. BRAY could not provide any proof of the business. BRAY stated that her mother, SAN-MARTIN was with her and GODINEZ-JIMENEZ for the entire trip although agents knew that to be untrue. BRAY stated she

drove SAN-MARTIN because she did not want her mother to drive the long distance due to high blood pressure.

7. During the interview of SAN-MARTIN, she claimed to be self-employed with a consulting business names Associates E. Importa Cinos LLC, but SAN-MARTIN could not provide a business phone, address, or partner's name. SAN-MARTIN stated that the business is out of Mexico. SAN-MARTIN attempted to claim the money as a retainer paid to her for her consulting, but she could not tell agents the exact amount of money that was paid to her. SAN-MARTIN was misleading on how long she had been in the St. Louis area, until finally admitting she flew into St. Louis the same day of the stop, in order to drive the target vehicle back to Texas. SAN-MARTIN states she did so because her daughter (BRAY) was afraid to drive with the currency inside of the vehicle because BRAY and GODINEZ-JIMENEZ looked like drug couriers driving the vehicle by themselves. SAN-MARTIN stated she did not know where the money came from, but by the end of the interview SAN-MARTIN stated she was worried about her daughter's safety.

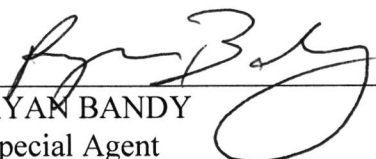
8. Based on the foregoing, declarant further believes that the subject-matter \$38,000.00 in United States Currency is property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. § 801 *et seq.*

9. Declarant believes, as a result of the foregoing, that SAN-MARTIN used the 2008 Buick Enclave, bearing VIN: 5GAER237X8J253639 to haul controlled substances as well as proceeds of the sale of said controlled substances, in order to facilitate the sale of controlled substances.

19. Declarant further believes that the 2008 Buick Enclave, bearing VIN:

5GAER237X8J253639, with all accessories, attachments and components thereon constitutes a conveyance which was used or intended to be used, to transport, or in any manner to facilitate the transportation, sale, receipt, possession or concealment of a controlled substance, and is thus subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a)(4).

Executed on this 25th day of October, 2016.



RYAN BANDY
Special Agent
Drug Enforcement Administration